

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES, LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Debtor.

**[PROPOSED] ORDER ON THE  
TRUSTEE'S MOTION TO COMPEL  
THE PRODUCTION OF  
DOCUMENTS**

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and the Estate  
of Bernard L. Madoff,

Plaintiff,

v.

STANLEY SHAPIRO, *et al.*,

Defendants.

Adv. Pro. No. 10-05383 (SMB)

Upon consideration of plaintiff Irving H. Picard's (the "Trustee") Notice of Motion to Compel the Production of Documents from defendants Stanley Shapiro, David Shapiro, Leslie Citron, and Kenneth Citron (collectively, "Defendants"), ECF No. 94 (the "Motion"), the Trustee's Memorandum of Law in Support of the Motion, ECF No 95, and the Declaration of Torello H. Calvani in Support of the Motion, ECF No 96; and it appearing that due and proper notice of the Motion and the relief requested therein having been given, and no other further

notice needing to be given; and a hearing having been held on the Motion on April 25, 2018 (the "Hearing"); and this Court having jurisdiction to consider the Motion under 28 U.S.C §§ 157 and 1334; and the Court having considered any papers submitted in support of and in opposition to the Motion, the arguments of counsel at the Hearing, and the record in this case:

**IT IS HEREBY ORDERED**, that the Motion is **GRANTED** as follows:

1. Defendant Stanley Shapiro shall produce all documents responsive to the requests directed to him, as identified in Exhibit A (Request Nos. 1–9, 11–15, 17, 19–20, 25–26, 29, 31, 33, 38, 43, and 48–49);
2. Defendant David Shapiro shall produce all documents responsive to the requests directed to him, as identified in Exhibit A (Request Nos. 1–4, 6–8, 11–16, 28–29, 35, 40, and 44–45); and
3. Defendants Leslie and Kenneth Citron shall produce all documents responsive to requests directed to them, as identified in Exhibit A (Requests Nos. 1–4, 6–8, 11–16, 28–29, 35, 40, and 44–45).

**IT IS HEREBY FURTHER ORDERED**, that contemporaneous with such productions, Defendants shall transmit to the Trustee a privilege log (if applicable) identifying the withheld documents and otherwise satisfying the requirements of Local Bankruptcy Rule 7034-1(c)(1) & (2).

**IT IS HEREBY FURTHER ORDERED**, that Defendants shall make such productions and shall deliver such privilege logs (if applicable) to the Trustee no later than thirty days from the date of this order.

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2018.

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE